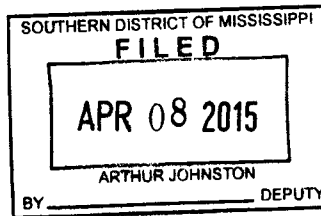


AO 91 (Rev. 11/11) Criminal Complaint

## UNITED STATES DISTRICT COURT

for the

Southern District of Mississippi



United States of America )

v. )

Reginald Addison, Marlicia Tabor, and Termaine )  
Strauther )Case No. 3:15mj 125-LRA )  
)  
)  
)  
)

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Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of April 6, 2015, in the county of Madison in the  
Southern District of Mississippi, the defendant(s) violated:*Code Section*

18 U.S.C. §1028(a)(7)

*Offense Description*

Reginald Addison, Marlicia Tabor, and Termaine Strauther did knowingly transfer, possess, or uses, without lawful authority, a means of identification of another person with the intent to commit, or to aid or abet, or in connection with, any unlawful activity that constitutes a felony under any applicable State law which is prohibited by Section 1028(a)(7), Title 18, United States Code.

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.

A handwritten signature in black ink, appearing to read "Nicholas Williamson".

Complainant's signature

SA Nicholas Williamson, USSS

Printed name and title

Sworn to before me and signed in my presence.

Date: 04/08/2015

A handwritten signature in black ink, appearing to read "Linda R. Anderson".

Judge's signature

City and state: Jackson, Mississippi

Linda R. Anderson, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT

I, the undersigned, Nicholas Williamson, having duly sworn an oath, do depose and say:

I am a Special Agent of the United States Secret Service (USSS) and have been so employed since February of 2010. As part of my law enforcement duties, I am statutorily charged with investigating criminal cases involving the fraud and related activity with access devices.

Based upon the information obtained as a result of this investigation, there is probable cause to believe that Reginald Addison, Marlicia Tabor, and Termaine Strauther, did knowingly commit the following offense against the United States:

Knowingly transfers, possesses, or uses, without lawful authority, a means of identification of another person with the intent to commit, or to aid or abet, or in connection with, any unlawful activity that constitutes a felony under any applicable State law which is prohibited by Section 1028(a)(7), Title 18, United States Code.

The information contained in this affidavit is based upon my knowledge of this case and the knowledge and information provided to me by other law enforcement agencies familiar with the details of this investigation. Due to the fact that this affidavit is being submitted for the limited purpose of securing an arrest warrant, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that violations of Title 18, United States Code, Section 1028 – Fraud with identification information have occurred.

FACTS OF THE CASE

On April 6, 2015, at around 1:25 PM, Deputy J. Mangino of the Madison County Sheriff's Office conducted a traffic stop on a 2015 Dodge Charger displaying Ohio license plate FVM8837 after he spotted the vehicle traveling too closely behind another vehicle. Mangino made contact with the driver, Reginald Addison. Addison stated he (and the other two occupants) were traveling to somewhere in Mississippi to look at a vehicle, but did not know what city. Addison could also not provide any details about the vehicle they were supposedly going to see. He did state that it was actually his cousin who was going to possibly purchase the vehicle. Mangino then questioned the back seat passenger, Termaine Strauther, about their destination. Strauther stated that Addison was going to look at a car, but he also could not provide any details about the car. Strauther informed Mangino that the car they were currently traveling in was a rental in the name of Talisha

Glenn. The front seat passenger, Marlicia Tabor, provided Mangino with a copy of the rental agreement. Mangino discovered that the car was due to be returned on April 2, 2015. A criminal search conducted by Mangino revealed that Strauther had a prior arrest for a weapons violation. Mangino then asked Addison for consent to search the vehicle and Addison granted this request. Sgt. Tillotson with the Madison Police Department had arrived by this point to assist Mangino with the traffic stop. Tillotson conducted a pat down of Strauther and felt what appeared to be a piece of paper in his right front pocket. Tillotson asked Strauther what it was, and Strauther replied he did not know. Tillotson asked permission to remove it and Strauther granted the request. Tillotson removed the object and discovered a piece of paper which contained seven names and Social Security numbers. Tillotson then discovered seven Verizon bags inside the vehicle with iPhone accessories and receipts from transactions conducted in Cordova, Tennessee, Tupelo, Mississippi, and Columbus, Mississippi. Tillotson discovered additional Verizon receipts located in the back of the driver's seat. A search of the trunk revealed a duffel bag containing over thirty iPhones still in their original cases. Also in the duffel bag was a sheet of paper containing about 15 names and Social Security numbers. All three subjects were placed under arrest, read their Miranda rights, and were transported to the Madison County Sheriff's Office.

At the sheriff's office, Addison claimed to have purchased the phone on April 5, 2015, at a hotel near Columbus, Mississippi. He stated he purchased the phones from an unknown male for \$3,000.00. Tabor stated that she had driven most of the night from Michigan, and Addison had just begun driving before being pulled over. Strauther stated he had no knowledge of any of the phones being present in the car. However, a search of one of the phones revealed photos of what appeared to be Strauther conducting a FaceTime conversation. A search of another phone revealed photos of what appeared to be "selfies" of Strauther in a cell phone retail store. When confronted with this information, Strauther stated he had used one of the phones and could not provide an answer as to how his photos appeared on the other phone.

When inventorying Tabor's property, Capt. Tommy Jones discovered what appeared to be a new iPhone in her possession. Tabor stated the phone was hers and had been purchased recently. Jones was able to recover the original box of the phone in the vehicle, indicating that the phone was recently purchased.

Continuing on April 6, 2015, I arrived at the Madison County Sheriff's Office to assist in the investigation. After reviewing the receipts, I noticed that a receipt appeared to show that a Verizon account was opened under the name of Douglas Smith and four phone numbers and phones were activated under his name. Douglas Smith is a name that appears on the sheet of paper recovered from the duffel bag and the sheet of paper recovered from Strauther. I contacted Verizon's law enforcement support line, who confirmed that an account had recently been activated under Douglas Smith's Social Security number "within the last few days." The support line was unable to provide any further information at that time without a subpoena.

Continuing on April 6, 2015, I was able to make contact with Ronald Olney, whose name and Social Security number appeared on both of the lists. Olney stated he had not given anyone permission to use his Social Security number for any purpose, to include opening any accounts with Verizon.

On April 7, 2015, I was able to make contact with Brenda Towery, whose name and Social Security number appear on the list. Towery stated she had not given anyone permission to use her Social Security number for any purpose, to include opening any accounts with Verizon.

Continuing on April 7, 2015, I was able to make contact with Linda Sweeny, whose name and Social Security number appear on the list. Sweeny stated she had not given anyone permission to use her Social Security number for any purpose, to include opening any accounts with Verizon.

It should be noted that a TLO search conducted on all Social Security numbers recovered by the sheriff's office reveal the majority of the victims reside in Michigan, which is the residence of all the occupants from the vehicle.

Based on the foregoing information, I respectfully submit probable cause exists for an arrest warrant of Reginald Addison, Marlicia Tabor, and Termaine Strauther, for violating 18 USC 1028(a)(7).



Nicholas Williamson  
Special Agent, United States Secret Service

Sworn to and subscribed before me on the 8<sup>th</sup> day of April, 2015.



Linda R. Anderson, U.S. Magistrate Judge  
Southern District of Mississippi